



State of Ohio Environmental Protection Agency

Southeast District Office

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ENTERED

George V. Voinovich
Governor

May 12, 1992

RE: JACKSON COUNTY
JACKSON LANDFILL

Mr. J. Gregory Fields
450 Vaughn Street
Jackson, Ohio 45640

CERTIFIED MAIL

Dear Mr. Fields:

On April 4, 1992, Mr. Chris Walton, SEDO - Solid Waste Engineer, and I met with Mr. Steven Benson, SBA Consultants, and inspected the Jackson Landfill located on Smith Bridge Road, Jackson, Ohio.

I observed that little, if any, work had been completed since the inspection of November 5, 1991; therefore, this NOV is similar to the December 10, 1991 report.

During this inspection, the following violations of the Ohio Revised Code (ORC), Ohio Administrative Code (OAC) and the Director's Final Findings and Orders (DFFO's) that were issued to you on August 20, 1987, were observed. August 20, 1987, was also the effective date of the Orders.

A. DFFO's Violations

1. Order #3 and #6, respectively:

Order #3 - The operator shall submit to the Ohio EPA, SEDO, for approval, a ground water monitoring assessment plan sufficient to determine the impact of the facility on the ground water within 60 days of the effective date of these Orders. The operator immediately shall begin implementation of the approved plan in accordance with the schedules contained therein.

Order #6 - The operator shall submit to the Ohio EPA, SEDO, for approval, detailed plans for a leachate collection system within 60 days of the effective date of these Orders. The operator immediately shall begin installation of the leachate collection system in accordance with the schedule contained in the approved plans.

As pointed out in Mr. Stephen Hamlin's January 27, 1988 letter to Mr. John Noyes, both of the submitted plans had been reviewed and judged to be deficient.

To date, neither a leachate collection nor a ground water assessment/monitoring system has been installed as ordered by the Director.

2. Order #5 -

The operator immediately shall initiate action to minimize, control, or eliminate the conditions which contribute to the production of leachate.

Water coming in contact with the waste material contributes to the production of leachate. Therefore, action necessary to minimize, control or eliminate the production of leachate included a three to five percent slope on the top of the landfill to shed water and a landfill cap that meets the requirements of OAC 3745-27-10(C)(1) and (2) to slow the infiltration of water into the landfill.

To date, the landfill has not been capped as required.

3. Order #7 -

The Operator shall close the facility in accordance with Ohio Administrative Code Rule 3745-27-10 within 60 days of the effective date of the Orders. Please refer to the OAC 3745-27-10 violation listed below for specific violation of this order.

B. OAC Violation

At the time of the inspection, the following areas of non-compliance were observed and/or discussed with Mr. Benson:

1. OAC 3745-27-10(C)(1) requires that all waste materials be covered with at least two feet of well compacted cover material. All cover material shall consist of non-putrescible materials having low permeability to water, good compactibility, cohesiveness, and relatively uniform texture. Such cover material shall not contain stones, cobbles, boulders, or other large objects in such quantities as may interfere with its application and intended purpose.

8. OAC 3745-27-10(H)(1) and (2) requires that leachate discharging from the site be contained on site and treated, or collected and transported off-site for proper treatment. It also requires action to control, minimize or eliminate the conditions which contribute to the production of leachate.

The operator has failed to contain, collect, treat or control the generation of leachate. Leachate has been observed discharging from the following areas of the landfill:

- At several points on the East, North and West sides of the landfill.

The leachate discharge points were observed by Mr. Benson during the inspection. The leachate ultimately drains into waters of the state and leaves the landfill site causing a substantial threat of water pollution.

Compliance can be achieved by installing a system of pipes to drain all leachate outbreaks into a holding tank. The contents of the tank can then be pumped out as needed and transported to a municipal sewage treatment plant for treatment. Plans for leachate collection and containment should be sent to this office for review prior to installation. You should also obtain approval from the sewage treatment plant operator to discharge to the municipal system.

Leachate production can be controlled, minimized, and eliminated by diverting storm water away from the landfill using berms and ditches, maintaining a good soil and vegetative cap on the landfill, and filling in low spots on the landfill as they develop to prevent standing water on the landfill cap.

9. OAC 3745-27-10(G) and (H)(3) requires that monitor wells shall be maintained in such a condition that water samples may be obtained.

The operator has failed to install an approved ground water monitoring well system.

Compliance can be achieved by receiving approval and installing monitoring wells.

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In conclusion, the DFFO's of August 20, 1987, the Ohio Administrative Code (OAC) and the Ohio Revised Code (ORC) have been violated as outlined above.

I should point out that some solid waste rules (OAC) have changed, such as OAC 3745-27-11 - landfill capping requirements, which could effect the closure of this facility plus OAC 3745-27-14 which would effect post-closure care of the landfill.

Please provide this office with your written response to this letter within fifteen (15) days of receipt. Your response should list the reasons for the violations, what steps you will take to correct them and keep them from reoccurring and a time schedule for completing the actions.

Please contact me at this office if you have questions.

Sincerely,



Michael Nihiser, R.S.
District Representative
Division of Solid and Infectious Waste Management

MN/jg

cc: Mike Savage - DSHWM, CO
cc: Jackson County Health Commissioner
cc: Paul Cotter, AGO
cc: Michael Patrick, General Manager
Sanitary Commercial Services
1814 Smith Bridge Road
Jackson, Ohio 45640
cc: Steve Benson
SBA Consultants
Box 730
10247 Chillicothe Pike
Jackson, Ohio 45640



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ROY A. DePUE, P.E., P.S. - V.P./FIELD SERVICES

The borrow areas were actually in use until the maintenance ceased due to weather and did not receive seed and mulching. This will be attended to.

As indicated by our survey information, only a very few areas of the main landfill fail the slope criteria of over 1%/under 25%. Other areas may exist which also fail the criteria. Final decisions on slopes/caps, etc will depend on drilling/lab results which will come out of this summer's field work.

The existing "Closed" sign is erected at the fence/gate that leads to the main fill area. This is close to the property line. It is conceivable that the "closed" sign could be placed out at the public road area but this is quite a way from the actual property. We'll look into this.

The gate erected at the entrance to the main fill area is typically locked. The gate prior to this one at the public road is controlled by the Hauling Company which owns this property. I believe it is typically closed and locked during off hours. An adjacent gate blocks an abandoned township road. It to is typically locked.

I don't believe that there is any problem with unauthorized access to the site, but we will review the situation.

As previously mentioned, steps continue to be taken to control leachate interrupted only by the winter months. As the weather permits, many of your suggestions concerning diversion ditches, etc will be implemented.

I feel it was very advantageous to tour the site with you during you last inspection and hope we can do this on a regular basis.

Respectfully,

Steven Benson
SCB/bjr

CC: Mark Metcalf - DSHWM
Jackson Co. Health Dept.
Paula Cotter - AGO
Dewey Sanderson
Douglas Snyder - DGW - SEDO
Bob Carey - DSIWM



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March 30, 1992

OEPA-SEDO
2195 Front Street
Logan, Ohio 43138

Attn: Mr. Michael Nihiser, R.S.

Subj: Jackson Sanitary Landfill

Dear Mike:

This letter is in response to your inspection report letter dated March 6, 1992 to Mr. Fields.

As stated in the past, if our office could also receive a copy of these reports direct, the response time would improve some what.

As mentioned in our previous correspondence, our field work required for waste location was complete along with restoration before winter weather set in.

Other maintenance, regrading, seeding, etc has generally ceased during the winter due to site conditions.

Sent to your attention in February the draft plat, survey information, including site slopes, and the waste location reports should update you on progress in those areas. A "Final" plat will no doubt be affected by decisions not yet made concerning slopes, caps, etc.

The revised groundwater monitoring plant will be submitted to your office shortly and we hope to be able to start the drilling program when weather clears this spring/summer.

As I mentioned during your January site visit, we have been unable to get a final response from the City of Jackson concerning leachate disposal. Progress on an interim leachate collection plan is still stalled.

The disturbed and restored areas you noted near the entry gate represent interim efforts at control of leachate. The soil materials used here originated in the rear borrow areas and should be representative of the samples tested by B & N in 1986. Most of those soils tests exhibited adequate permeability for cover material.

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SEDO